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9 Attorneys for Plaintiff

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION
13

14 UNITED STATES OF AMERICA,)
15)
16 Plaintiff,)
17 v.)
18 MATT TEITELBAUM,)
19 Defendant.)
20

CR No.: 06-00175 MAG

STIPULATION AND ~~PROPOSED~~
ORDER EXCLUDING TIME

21 On May 24, 2006, the parties in this case appeared before the Court for a status
22 conference. At that time, the parties stipulated that time should be excluded from the
23 Speedy Trial Act calculations from May 24, 2006, through June 28, 2006, for continuity
24 of counsel and for effective preparation of defense counsel. The parties represented that
25 granting the continuance was the reasonable time necessary for effective preparation of
26 counsel for the Government, taking into account the exercise of due diligence. See 18
27 U.S.C. § 3161(h)(8)(B)(iv). The parties also agreed that the ends of justice served by
28 granting such a continuance outweighed the best interests of the public and the defendant

1 in a speedy trial. See 18 U.S.C. § 3161(h)(8)(A).

2
3 SO STIPULATED:

4 KEVIN V. RYAN
United States Attorney

5
6 DATED: 6/11/06

7 /s/
DEREK R. OWENS
Special Assistant United States Attorney

8
9 DATED: 6/12/06

10 /s/
RONALD C. TYLER
Attorney for Mr. Teitelbaum

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12 As the Court found on May 24, 2006, and for the reasons stated above, the Court finds
13 that an exclusion of time between May 24, 2006, through June 28, 2006, is warranted and
14 that the ends of justice served by the continuance outweigh the best interests of the public
15 and the defendant in a speedy trial. See 18 U.S.C. §3161 (h)(8)(A). The failure to grant
16 the requested continuance would deny defense counsel the reasonable time necessary for
17 effective preparation, taking into account the exercise of due diligence, and would result
18 in a miscarriage of justice. See 18 U.S.C. §3161(h)(8)(B)(iv).

19
20 SO ORDERED.

21
22 DATED: June 14, 2006

